

OU 9 (OPWL) Phase I RFI/RI Work Plan Meeting With CDH/EPA--December
18, 1991

The following notes document the referenced meeting and convey my interpretations of the topics discussed.

PURPOSE OF MEETING

The meeting was held to discuss CDH comments and concerns with the draft final OU 9, Original Process Waste Lines (OPWL) Phase I RFI/RI Work Plan.

ATTENDEES

- Arturo Duran, EPA
- Randy Ogg, EG&G/RPD
- Chris Rayburn, IT
- Joe Schieffelin, CDH
- Bruce Thatcher, DOE/ER

TOPICS DISCUSSED

- CDH is concerned with how the OPWL will undergo RCRA closure. The history of the OPWL as a RCRA closure unit was discussed, as well as the status of existing RFP closure plans under the IAG. CDH suggested that the OPWL be subdivided for purposes of closure into separate units focused around tank locations. These units would include ancillary piping in the vicinity of the tanks. Long stretches of pipeline not associated with a particular tank location would be excluded from the OPWL closure, allowing for more flexible remediation options than are available under closure regulations. If any of the long pipelines required interim action, they would be addressed under a different IM/IRA than the tank units.
- CDH believes the OU9 Environmental Evaluation Work Plan (EEWP) is overscoped and not easily applicable to an industrial area such as the Rocky Flats main production facility. It was pointed out that the OU9 EEWP includes a

decision point as to whether an EE is necessary or appropriate for OU9. DOE wishes to remove EEWPs from the OU work plans altogether and questions the performance of EEs in industrial areas of RFP. It was agreed that if EEs are conducted at RFP, they should focus on environmental systems at the plant (e.g., the major drainageways) rather than on the individual OUs.

- EPA questioned whether a future residential land use scenario should be considered under the OU9 BRAP. DOE believes that this is required under DOE Order 5400.5 and the NCP, but that the residential scenario should be considered on a site-wide basis rather than an OU-specific basis.
- CDH was concerned that incorporating IHSSs from other OUs into OU9, as recommended in the work plan, would require changes in the FSP. CDH was assured that this was not the case; the FSP as presented addresses all of the OPWL, including IHSSs in other OUs. It was also recognized that incorporating these IHSSs into OU9 would require revision of the IAG. It was decided that the work plan should simply identify the redundancy between OU9 and other OUs, rather than propose or recommend that redundant IHSSs be incorporated into OU9.
- CDH questioned whether the accessibility of the OPWL had been investigated. EG&G pointed out that most access problems will be in the PA. Accessibility was investigated during preparation of the draft OU9 work plan, but this information was not specifically included in the work plan. It was agreed that all available information on site access will be incorporated into the final work plan.
- CDH and EPA are concerned over the DOE budget for OU9. The agencies expressed an interest in working with DOE on budget issues that may affect IAG milestones.
- Elizabeth Pottorff of CWQCC has compiled numerous hydraulic conductivity (K) values for the Rocky Flats Alluvium to support an independent ground water model for RFP. Many of her K values are in the 10^{-3} to 10^{-4} range, well below the average K value used in the OU9 conceptual model. The OU9 K values were obtained from the ongoing site-wide geologic characterization for RFP. Many other K values have been measured in past RFP studies, and it is possible that some of these values have been included in the CWQCC compilation. Higher K values would allow greater infiltration into native soil from trench fill materials saturated by an OPWL release. Most infiltration would be downward from the trench rather than horizontal to it, and the Task 2 soil borings proposed in the FSP will allow evaluation of downward infiltration. The use of modelling to predict the spread of contamination from a hypothetical pipeline release was discussed. It was also agreed that EG&G personnel familiar with the geologic

characterization project will be contacted for their input on Rocky Flats Alluvium hydraulic conductivity.

- DOE addressed the possibility of conducting a limited ground water investigation during the Phase I RFI/RI. Ground water sampling was not included in the recent budgetary estimates for implementing the OU9 RFI/RI, and EG&G feels that the current budget will not support the additional sampling and analytical costs for ground water samples. CDH indicated that the agencies cannot require DOE to include ground water assessment in the Phase I RFI/RI because the IAG scope **specifically focuses on sources and soils.**
- Use of mobile laboratory facilities to support future OU RFI/RI work is being evaluated by DOE and EG&G.
- CDH requested that the conceptual model more clearly indicate which exposure pathways will be addressed during the Phase I RFI/RI. CDH also requested revisions to the conceptual model figure, and provided a draft of the suggested revisions.
- Conditional approval of the OU9 work plan by CDH and EPA appears likely based on their review of the draft final work plan. Conditional approval will be predicated on response to agency comments.

ACTION ITEMS

- DOE will consider the CDH suggestion of subdividing the OPWL for purposes of RCRA closure.
- CDH and EPA will consider DOE's suggestion to remove EEWPs from the OU work plans and consider the performance of EEs in industrial areas of RFP. DOE suggests that the Colorado Division of Wildlife and the U.S. Fish and Wildlife Service be included in any discussions.
- CDH and EPA comments on the OU9 work plan will include the issues discussed at the meeting. These comments are expected to be transmitted to DOE on or before January 6, 1992.